

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

**JACK STEPHEN PURSLEY,
AKA STEVE PURSLEY**

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NO. 4:18-CR-575 (HUGHES)

Joint Motion to Admit Trial Exhibits

The United States and counsel for Jack Stephen Pursley have stipulated to the authenticity and admissibility of the exhibits listed below. Accordingly, the parties jointly move the Court to pre-admit the following exhibits into evidence:

United States' Trial Exhibits

Gov't Ex No.	Description
1-6	9/19/2001 Certificate of Incorporation for Southeastern Shipping Company Ltd.
1-7	9/24/2001 Engagement Letter between SES and Venerabile
1-8	11/1/2006 Certificate of Incorporation for Pelhambridge Ltd.
1-9	3/6/2007 Stock Purchase Agreement Between Gulf States Management Corp. and S. Mooney for \$900,000
1-11	9/30/2007 Minutes of Special Meeting of Directors for Diversified Land Holdings, Inc. Resolving to Purchase 100,000 Shares in Gulf States
1-12	10/20/2007 Minutes of Special Meeting of Directors for Diversified Land Holdings, Inc. Resolving to Purchase 50,000 in Gulf States
1-13	10/22/2007 Stock Sale Agreement between Diversified Land Holdings, Inc. and Pelhambridge Ltd. for \$960,000
1-14	10/31/2007 Minutes of Meeting of the Board of Directors of Pelhambridge Ltd.
1-15	11/1/2007 Wire transfer detail for \$961,000
1-16	11/1/2007 Wire transfer detail for \$960,000
1-17	11/5/2007 \$250,000 Wire transfer from Gulf States Management Corporation to S. Pursley
1-18	11/30/2007 Chase Statement in the name of Gulf States Management Corporation
1-23	1/15/2008 Stock Sale Agreement between Diversified Land Holdings, Inc. and Pelhambridge Ltd.

Gov't Ex No.	Description
1-24	2/12/2008 Minutes of Meeting Pelhambridge Ltd. Board of Directors
1-25	2/29/2008 Wire Transfer Detail for \$875,000 from Southeastern Shipping to Isle of Man Trust
1-26	2/29/2008 Wire Transfer Detail for \$875,000 from Isle of Man Trust to Diversified Land Holdings
1-27	8/10/2008 Pelhambridge Limited IOMFT Know Your Client with S.Mooney as Beneficial Owners
1-28	9/9/2008 Minutes of Meeting of Pelhambridge Ltd. Board of Directors, re Opening of Royal Bank of Scotland Int'l Ltd. Account with S.Mooney as Beneficial Owner
1-29	3/4/2009 Stock Sale Agreement between Diversified Land Holdings, Inc. and Pelhambridge Ltd. for \$900,000
1-30	3/4/2009 Minutes of Meeting of Pelhambridge Ltd. Board of Directors for \$900,000
1-31	4/12/2009 Representation Agreement between The Pursley Law Firm, PLLC and S. Mooney
1-32	4/24/2009 Invoices for T. Foster
1-34	6/3/2009 Minutes of Meeting Southeastern Shipping Company Ltd. Board of Directors
1-35	5/9/2009 Memorandum from T. Foster to S. Pursley re: SES
1-36	6/10/2009 Confidential Memorandum from S. Mooney to Management and Administrators of Southeastern Shipping Company Ltd. and Isle of Man Trust Limited, Re. S. Pursley Authority
1-37	6/10/2009 Confidential Memorandum from E. Venerable to Management and Administrators of Southeastern Shipping Company Ltd. and Isle of Man Trust Limited, Re. S. Pursley Authority
1-38	6/25/2009 IOMFT Know Your Client Form and Documents- S. Mooney
1-39	6/30/2009 Limited Partnership Agreement of Recruitment Partners, L.P.
1-40	8/1/2007 Minutes of Diversified Land Holdings Board of Directors, Re: Sale of 120,000 Shares of Stock to Pelhambridge
1-42	7/24/2009 Private Placement Memorandum for Four Sevens Investment Corp.
1-43	7/30/2009 Letter from E. Venerable to the Directors of Southeastern Shipping Company Ltd., Re: Distribution for \$3,625,000
1-44	7/30/2009 Subscription Agreement for \$3,625,000 between Four Sevens Investment Corp. and Australian Partners Holding Corp. PTY Ltd.
1-47	8/25/2009 IOMFT Know Your Client Form - Pelhambridge (E. Venerable)
1-49	8/27/2009 Email from S. Pursley to C. Gillis, Re: Instructions for \$3,625,000 transfers
1-50	8/28/2009 Wire transfer detail for \$3,625,000 from Southeastern Shipping Company Limited to C. Gillis PLLC IOLTA
1-51	9/22/2009 File Note re: Southeastern Shipping Limited & Pelhambridge Ltd.
1-54	10/16/2009 - Land Title Guarantee Company Settlement Statement for 1600 Colorow Road

Gov't Ex No.	Description
1-55	10/16/2009 Promissory Note between S. Mooney and Diversified Land Holdings for \$1,600,000 for Purchase of 1600 Colorow Road
1-56	1/28/2010 Private Placement Memorandum for American Real Estate Properties
1-57	3/8/2010 Letter from C. Gillis to the Directors of Southeastern Shipping Company Ltd., Re: Request for Dividend Declaration and Distribution & 2/12/2010 Minutes of Meeting of Australian Partners Holding Corp. Board of Directors
1-58	6/4/2010 Promissory Note for \$3,900,000 between AREP Ritz Partners, LLC and American Real Estate Properties, Inc.
1-59	6/7/2010 Promissory Note for \$500,000 between Pursley Interests, LLC and Four Sevens Investment Corp.
1-61	6/25/2010 Email from M. Sternfield to S. Dorman re: 2610 Arosa Dr.
1-62	7/10/2010 Email from S. Pursley to A. Mellor, Re: Instruction for Request
1-63	7/12/2010 Private Placement Memorandum for Global American Properties, Inc.
1-66	8/1/2010 Promissory Note between Arosa Partners, LLC and Four Sevens Investment Corp.
1-67	8/2/2010 Wire Transfer Detail for \$852,117
1-68	8/3/2010 Settlement Statement for 2610 Arosa Drive
1-69	8/3/2010 Disbursement Statement for 2610 Arosa Drive
1-70	8/17/2010 Email from S. Pursley to G. Bratcher re Doc Terms to Review
1-71	9/22/2011 Check from Pursley Interests to S. Pursley for \$222,000
1-82	Agreement for Participating Interest between Pursley Interests, LLC and American Real Estate Properties, Inc. for \$300,000
1-83	7/17/2010 Subscription Agreement between Global American Properties, Inc. and Australian Partners Holding Corporation PTY Ltd.
1-86	Charles Schwab (x1072) - Gulf States Management Corporation - Statement 2007 (Nov.)
1-87	Charles Schwab (x1072) - Gulf States Management Corporation - Statement 2007 (Dec.)
1-90	Chase (x9401) - Gulf States Management Corporation - Statement 2007
1-91	Chase (x940-1) - Gulf States Management Corporation - Statement 2008
1-92	Account Application for E-Trade Securities LLC (X4096) - S. Pursley
1-96	May 2009 S. Pursley Plane Ticket to Isle Of Man
1-100	Royal Bank of Scotland International, Isle of Man Branch (x7806) Southeastern Shipping Company Ltd. - Statement 2007
1-101	Royal Bank of Scotland International, Isle of Man Branch bank (x7806) - Statement 2008
1-102	Royal Bank of Scotland International, Isle of Man Branch (x7806) Southeastern Shipping Company Ltd. - Statement 2009
1-103	Royal Bank of Scotland International, Isle of Man Branch (x7806) Southeastern Shipping Company Limited - Statement 2010

Gov't Ex No.	Description
1-104	Royal Bank of Scotland International, Isle of Man Branch bank (x7806), Southeastern Shipping Company Limited - Statement 2010
1-105	Royal Bank of Scotland International, Isle of Man Branch (x7806) Southeastern Shipping Company Limited - Statement 2010
1-106	Royal Bank of Scotland International, Isle of Man Branch (x4836) - Pelhambridge Limited - Statement 2008
1-107	Royal Bank of Scotland International, Isle of Man Branch bank (x4836) - Pelhambridge Limited - Statement 2008
1-108	Royal Bank of Scotland International, Isle of Man Branch bank (x4836) - Pelhambridge Limited - Statement 2009
1-109	Sanford C. Bernstein & Co., LLC (3314) - Four Sevens Investment Corporation - Statement 2009
1-110	Sanford C. Bernstein & Co., LLC (x3359) - Four Sevens Investment Corporation - Statement 2009
1-111	Sanford C. Bernstein (x9166) - Four Sevens Investment Corporation - Statement 2010
1-112	Sanford C. Bernstein (x9166) - Four Sevens Investment Corporation - Statement 2010 (June)
1-113	Sanford C. Bernstein (x9166) - Four Sevens Investment Corporation - Statement 2010 (August)
1-114	Smart Financial Credit Union (x5710) (x5740) Four Sevens Investment Corporation - Statement 2009 (August)
1-129	Subscription Agreement between American Real Estate Properties, Inc. and Australian Partners Holding Corporation PTY Ltd.
1-131	Washington Mutual Bank (940-1) - Gulf States Management Corporation - Statement 2007 (Nov.)
1-132	Washington Mutual Bank (563-0) - Gulf States Management - Statement 2007 (Nov.)
1-133	Washington Mutual Bank (940-1) - Gulf States Management Corporation - Statement 2008 (March)
1-135	Wells Fargo Bank (x8312) Diversified Land Holdings Inc. - Statement 2008 (February)
1-136	Wells Fargo Bank (x8312) Diversified Land Holdings Inc. - Statement 2008 (March)
1-137	Wells Fargo Bank, N.A. (x8312) Diversified Land Holdings Inc. - Statement 2009 (March)
1-140	Wells Fargo Bank, N.A. (x8312) - Diversified Land Holdings Inc. - Statement 2007 (November)
1-142	Wells Fargo Bank, N.A. (x8312) Diversified Land Holdings Inc. - Statement 2009 (October)
1-145	Wells Fargo Bank, N.A. (x9822) Charles Michael Gillis PLLC IOLTA Account – Statement 2009 (August)
1-146	Wells Fargo Bank, N.A. (x9822) Charles Michael Gillis PLLC IOLTA Account – Statement 2010 (March)

Gov't Ex No.	Description
1-148	Wells Fargo Bank, N.A. (x4315) American Real Estate Properties Inc. – Statement 2010 (March)
1-149	Wells Fargo Bank, N.A. (x9822) Charles Michael Gillis PLLC IOLTA Account – Statement 2010 (July)
1-151	Wells Fargo Bank, N.A. (x9822) Charles Michael Gillis PLLC IOLTA Account – Statement 2010 (September)
1-153	Wells Fargo Bank, N.A. (x4265) Global American Properties Inc. - Statement 2010 (July)
1-154	Wells Fargo Bank, N.A. (x4315) American Real Estate Properties Inc. - Statement 2010 (August)
1-156	Wells Fargo Bank, N.A. (x4265) Global American Properties Inc. - Statement 2010 (September)
1-162	3/30/2018 J. Pursley Deposition Transcript, Ex. 2 (6/4/2009 Email from K. Smith to Pursley)
1-163	Mooney Certified Travel Records
1-164	Pursley Certified Travel Records
1-167	3/30/2018 J. Pursley Deposition Transcript, Ex. 7 (4/12/2009 Representation Agreement)
2-6	11/10/2009 Email from S. Pursley to L. Jude, A. Mellor re: Follow-Up Instructions on Venerable Account
2-7	10/3/2007 Letter from A. Thomas to "Director Pelhambridge Ltd" re: \$2.5 Million Loan Facility
2-28	7/23/2009 Email from S. Pursley to tracyd@iomft.co.im;andrewt@iomft.co.im;kerrys@iom.co.im re: Draft - Instructions Letter
2-51	7/10/2010 Email from S. Pursley to A. Mellor re: Instruction for Request
2-54	1/18/2010 Letter from A. Mellor to S. Pursley re: Pelhambridge Limited (the "Company")
2-55	10/2/2007 Pelhambridge Limited Meeting Minutes
2-58	11/13/2008 Fax from A. Mellor to S. Mooney re: Diversified Land Holdings, Inc.
2-59	3/16/2009 Fax from S.E. Shipping to A. Mellor at Pelhambridge re: A. Mellor Visit to the United States
2-69	2/29/2008 Inter Account Transfer Confirmation for \$875,000
2-70	Payment Search Summary: 3/20/2009 Payment for \$900,000
2-71	9/9/2008 Minutes of Meeting Pelhambridge Ltd. Board of Directors, 9/9/2008 Engagement Letter, and Terms and Conditions
2-77	10/9/2007 Minutes of Meeting Pelhambridge Ltd Board of Directors
2-78	10/31/2007 Minutes of Meeting Pelhambridge Ltd. Board of Directors & 10/22/2007 Stock Sale Agreement
3-3	11/18/2010 Email from A. Mellor to S. Pursley re SES Management Accounts, and attached Financial Documents
4-36	8/11/2009 Email from S. Pursley to S. Mooney re: Your Trip

Gov't Ex No.	Description
4-47	9/27/2001 Consultancy Contract between Southeastern Shipping Company Limited and S. Mooney
4-49	7/10/2009 Email from S. Pursley to K. Smith, re: Miscellaneous Follow-up
4-73	5/7/2007 Email from S. Mooney to S. Pursley re: Company Names
4-78	2/27/2007 Waiver Agreement between S. Pursley and S. Mooney
4-80	4/21/2009 Letter from S. Pursley to S. Mooney re: Waiver of Claims - Southeastern Shipping Company, Ltd.
4-81	4/20/2009 Letter from S. Pursley to S. Mooney re: Clarifications Regarding Status of Corporate Activity.
4-83	10/1/2009 Memorandum from S. Mooney to S. Pursley re: Progress Report and Advisement
4-105	7/22/2009 Email from K. Smith to S. Pursley re: Forms
4-109	8/13/2009 Email from L. Jude to S. Pursley re: Meetings
4-110	8/17/2009 Email from K. Smith to S. Pursley re: Documents from C. Gillis
4-111	8/22/2009 Email from S. Pursley to S. Mooney re: Confirmation
4-115	8/24/2009 Email from K. Smith to S. Pursley re: Travel Flights
4-117	8/26/2009 Email from K. Smith to S. Pursley re: Formalities of Ownership
4-118	8/26/2009 Email from K. Smith to S. Pursley re: Trip
4-120	9/6/2009 Email from S. Mooney to E. Venerabile re: Our Trip?
4-124	8/28/2009 Email from A. Mellor to S. Pursley re: Payment Transfer
4-125	9/1/2009 Email from K. Smith to S. Pursley re: SES
4-171	8/5/2009 Email from S. Pursley to S. Mooney, re: Meeting 10:00 Thursday
4-172	8/21/2009 Email from S. Pursley to E. Venerabile, re: Confirmation
4-180	7/22/2009 Email from K. Smith to S. Pursley
4-181	Share Agreement Certificate for Pelhambridge Limited
4-193	S. Mooney Tax/OVD Penalty Payment Checks
4-194	05/26/2007 Pursley Law Firm Letter to S. Mooney
5-3	Ratification of Corporate Governance and Administrative Actions Undertaken by Officers and Directors of Southeastern Shipping Co. Ltd.
5-4	6/21/2009 Email from S. Mooney to E. Venerabile re: Documents
5-5	6/22/2009 Email from S. Mooney to Kome HSE and S. Pursley re: Address in Rio
5-14	6/15/2009 Email from E. Venerabile to S. Pursley re: Miscellaneous
5-15	Ratification and Indemnification of Corporate Actions of Southeastern Shipping Co. Ltd. for the Formation and Ownership of Pelhambridge Ltd.
5-24	1/20/2010 Email from A. Mellor to S. Pursley re: Invoices
5-26	Waiver Agreement between S. Pursley and E. Venerabile
5-27	Stock Purchase Agreement between E. Venerabile and Australian Partners Holding Corp. Pty Ltd.
5-38	Share Certificate for Australian Partners Holding Corp.
5-39	9/27/2009 Purchase Resolution from Australian Partners, C. Gillis
5-43	8/10/2009 Email from S. Pursley to E. Venerabile, re: Another Document

Gov't Ex No.	Description
5-44	11/13/2009 Email from S. Pursley to E. Venerabile, re: Agreement Attached for Your Review and Response
5-47	9/26/2009 Pelhambridge Consulting Agreement, Signed by TC.James, T.Duncan
5-48	9/26/2009 Pelhambridge Consulting Agreement, Signed by E. Venerabile
6-2	Documents Provided by S. Pursley & S. Mooney
6-3	York & Hines Billing Sheet for S. Mooney
7-1	7/2/2009 Registration of Australian Partners holding Corporation Pty. Ltd.
7-2	8/24/2009 Australian Partners Holding Corp. Pty Ltd.
8-1	4/17/2009 Email from T.Foster to S. Pursley re: S. Mooney
8-2	4/24/2009 Email from T.Foster to S. Pursley re: Stock Purchase Agreement
8-3	5/9/2009 Memorandum re SES Ownership
8-4	5/7/2009 Email from T. Foster to S. Pursley re: Tax and Ownership Issues
8-6	5/11/2009 Email from S. Pursley to T. Foster re: my current to do items
8-8	5/15/2009 Email from T. Foster to S. Pursley re: FBAR reporting and liquidation issues
8-9	5/8/2009 Email from T. Foster to S. Pursley re: Draft Attached
8-10	6/30/2009 Email from T. Foster to S. Pursley re: Trust
8-13	4/24/2009 Draft Memorandum Re Summary of Tax Planning for SES Acquisition
8-14	5/19/2009 Email from T. Foster to S. Pursley re: Obama's recent Foreign Tax Proposals and Alternative Risk Planning
8-16	5/7/2009 Memorandum from T. Foster to S. Pursley re SES Ownership
9-11	4/29/2009 Email at 11:59 AM from C. Gillis to S. Pursley re: Initial Draft of Stock Purchase Agreement and with 4/29/2009 Draft Attached
9-13	5/7/2009 Email from S. Pursley to C. Gillis, Attch. re: SES Acq.; 4/30/2009 Stock Purchase Agreement re: Acquisition Partners Ltd with Draft Signed by E. Venerabile Attached
9-15	5/19/2009 Email from C. Gillis to S. Pursley re: Scope of Work
9-36	7/9/2009 Email from C. Gillis to "5Gloves" re: Yellow with Pink Polka Dots. Pty Limited
9-38	7/10/2009 Email from C. Gillis to S. Pursley, S. Mooney re: Subscription Agreement, Attch.. Sample Sub.
9-55	8/6/2009 Email from C. Gillis to S. Pursley, S. Mooney: re: Australian partners Holding Corp . - Capitalisation Issues
9-58	8/7/2009 Email from C. Gillis to S. Pursley, S. Mooney re: Advisement Ltr. Re: Advisement Letter 7/30/2009
9-61	8/9/2009 Letter from S. Pursley to C. Gillis
9-69	8/17/2009 Email from C. Gillis to K.Smith and others re: Australian Partners Holding Corp., Attach. 8/17/2009 Letter from C. Gillis to Directors of Southeastern Shipping Company Ltd.
9-71	8/24/2009 Email from C. Gillis to S. Pursley, Attach. 8/4/2009 Letter from C. Gillis to M.Coughtrey re: Australian Partners Holding Corp.

Gov't Ex No.	Description
9-97	Minutes & Meeting Forms of Diversified Land Holdings, Inc.
9-105	5/7/2009 Email from C. Gillis to S. Pursley re: Update Summary
9-117	3/8/2010 Email from C. Gillis to A. Miller, M. Coughtrey and E. Venerabile re: Request for Dividend Distribution/Southeastern Shipping Company Limited
9-118	7/25/2010 Email from C. Gillis to A. Miller, M. Coughtrey and E. Venerabile re: Request for Dividend Distribution - Southeastern Shipping Company Limited
9-132	7/28/2010 Email from C. Gillis to S. Mooney and S. Pursley re: Transfer of Funds
9-133	7/21/2009 Email from C. Gillis to S. Pursley and S. Mooney re: Trust Account
9-147	11/4/2009 Opinion Letter from C. Gillis to S. Pursley re: Federal Income Tax Consequences of Receipt of Payment in Exchange for Issuance of Common Stock
9-148	6/25/2010 email from S. Pursley to C. Gillis re: formation of Arosa Partner, LLC
9-149	4/29/2009 Email from C. Gillis to S. Pursley re: Stock Purchase Agreement With Draft Agreement Attached.
9-150	7/10/2009 Email from C. Gillis to G. Glover re: Brazilian Will Invest in US entities
9-151	7/22/2009 Email from C. Gillis to G. Glover re: APHC's percentage Ownership of US Corporations
12-9	11/5/2007 Promissory Note: S. Pursley to Gulf States Mgmt. Corp
12-10	11/2/2009 Email from A. Mellor to S. Pursley re Consulting Scvs Agrmt
12-34	11/19/2009 to Present: FSIC Record of Promissory Notes Paid Back, Notes Outstanding, and Other Expenditures
12-40	7/8/2009 letter from S. Pursley to K. Smith re: Follow-up items requested
12-45	8/5/2009 Email from K. Smith to S. Pursley re: Southeastern Shipping
13-1	9/2001 Account Opening Documents for SES Account x7806
13-2	9/2008 Account Opening Documents for Pelhambridge
14-1	6/6/2010 AFI Investments, LLC New Member Acknowledgement for Pursley Interests LLC
15-3	Agreement for Participating Interest, American Real Estate and Pursley Interests, LLC
15-4	12/31/2010 American Real Estate Properties Financial Statement
15-20	12/31/2010 Gulf States Management Corporation, Trial Balance
15-36	Arosa Partners, LLC Financial Documents (2010)
15-37	8/7/2010 Email from S. Pursley to G. Bratcher re: Agreement AFI Venture, attaching Email from S. Pursley to G. Bratcher re: Agreement AFI Venture (containing draft agreement for participating interest in AFI)
15-47	Pursley Interests LLC Trial Balance (2010)
15-49	Arosa Partners LLC Trial Balance (2010)

Gov't Ex No.	Description
15-53	2/4/2010 Emails between S. Pursley to G. Bratcher re: FSIC investment income
15-54	Email from S. Pursley to J. Ortega (Bratcher) re: Personal Tax Return Estimate, addresses rental income for Arosa property
15-55	Summary of Withdrawals from Corporations
17-1	2010 Form 1120 Corporation Income Tax Return - American Real Estate Properties Inc.
17-5	2010 Account Transcript - American Real Estate Properties
17-10	2009 Form 1120 Corporation Income Tax Return - Diversified Land Holdings Inc.
17-15	2008 Account Transcript - Diversified Land Holdings Inc.
17-16	2009 Account Transcript - Diversified Land Holdings Inc.
17-21	2009 Form 1120 Corporation Income Tax Return - Four Sevens Investment Corp.
17-22	2010 Form 1120 Corporation Income Tax Return - Four Sevens Investment Corp.
17-31	2009 Account Transcript - Four Sevens Investment Corp.
17-32	2010 Account Transcript - Four Sevens Investment Corp.
17-40	2010 Form 1120 Corporation Income Tax Return - Global American Properties Inc.
17-50	2009 Form 1120 Corporation Income Tax Return - Gulf States Management Corp.
17-51	2010 Form 1120 Corporation Income Tax Return - Gulf States Management Corp.
17-58	2010 Account Transcript - Gulf States Management Corp.
17-64	2009 Form 1040 Individual Tax Return - Processed - S. Mooney
17-65	2010 Form 1040 Individual Tax Return - Processed - S. Mooney
17-71	2009 Form 1040X Amended Individual Tax Return - S. Mooney
17-72	2010 Form 1040X Amended Individual Tax Return - S. Mooney
17-76	2009 Account Transcript - S. Mooney
17-77	2010 Account Transcript - S. Mooney
17-84	2009 Form 1040 - Individual Income Tax Return - S. Pursley
17-85	2010 Form 1040 - Individual Income Tax Return - S. Pursley
17-100	2009 Account Transcript - S. Pursley
17-101	2010 Account Transcript - S. Pursley
19-1	10/1/2010 Email from S. Pursley to R. Armour re: Follow-up Contact Info
23-1	Arosa JV, LLC Entity Details and Limited Liability Company Charter
26-1	Acquisition Partners GP, LLC: State Corporate Records
26-2	Acquisition Partners, L.P.: State Corporate Records
26-3	American Real Estate Properties, Inc.: State Corporate Records
26-4	AREP Ritz Partners, LLC: State Corporate Records
26-5	Arosa Partners, LLC: State Corporate Records
26-6	Diversified Land Holdings, Inc.: State Corporate Records

Gov't Ex No.	Description
26-7	EAP Investments: State Corporate Records
26-8	Four Sevens Investment Corporation: State Corporate Records
26-9	Global American Properties, Inc.: State Corporate Records
26-11	Gulf States Management Corporation: State Corporate Records
26-14	International Recruitment Corporation: State Corporate Records
26-15	International Recruitment GP, L.L.C.: State Corporate Records
26-16	JSP Interests, L.L.C.: State Corporate Records
26-19	NJP Investments, LLC: State Corporate Records
26-20	Pursley Interests, LLC: State Corporate Records
26-21	Recruitment Partners, L.P.: State Corporate Records
26-22	The Pursley Law Firm: State Corporate Records
33-1	Corporate Documents of Pelhambridge Ltd.
34-1	8/27/2009 Resolution of Board of Directors of APHC to Purchase SES from E. Venerable for Approx. 15M to be Funded by Share Allotment to Venerable
34-4	7/27/2009 Change to company details - APHC Changes Ownership from Acquisition Partners to Venerable
35-1	8/1/2010 Promissory Note from Arosa Partners LLC to Four Sevens Investment Corp from Arosa Partners, LLC
37-1	5/9/2007 Invoices for Corporation Formation of Diversified Land Holdings, Inc. by S. Pursley
200-5	Wells Fargo (x2328) - Recruitment Partners, LP - Account Statements - 2009
200-6	Wells Fargo (x2328) - Recruitment Partners, LP - Account Statements - 2010
201-2	Wells Fargo (x9822) - Charles Michael Gillis PLLC IOLTA - 9/13/2010 Check to Global American Properties for \$3,898,500
201-3	Wells Fargo (x9822) - Charles Michael Gillis PLLC IOLTA - Account Statements - 2008
201-4	Wells Fargo (x9822) - Charles Michael Gillis PLLC IOLTA - Account Statements - 2009
201-5	Wells Fargo (x9822) - Charles Michael Gillis PLLC IOLTA - Account Statements - 2010
201-8	Wells Fargo (x9822) - Charles Michael Gillis PLLC IOLTA - 7/28/2010 Withdrawal Slip for \$3,898,875
201-9	Wells Fargo (x9822) - Charles Michael Gillis PLLC IOLTA - 3/16/2010 Withdrawal Slip for \$3,900,000
202-3	Wells Fargo (x74265) - Global American Properties Inc. - Account Statements - 2010
203-4	Wells Fargo (x4315) - American Real Estate Properties Inc. - Account Statements - 2010
206-3	Wells Fargo (x38312) - Diversified Land Holdings Inc. - Account Statements - 2009

Gov't Ex No.	Description
206-4	Wells Fargo (x38312) - Diversified Land Holdings Inc. - Account Statements - 2010
208-2	Wells Fargo (x40297) - Global American Properties Inc. - Account Statements - 2010
221-1	Smart Financial Credit Union (x0290/0300) - Arosa Partners LLC - Account & Deposit Statements - 2010
222-1	Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - Account & Deposit Statements - 2009
222-2	Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - Account & Deposit Statements - 2010
224-2	Smart Financial Credit Union (0370/0380) - Pursley Interests, LLC - Account & Deposit Statements - 2010
229-3	Sanford Bernstein & Co (x 3314) - Four Sevens Investment Corp. - Account Statements (8/31/2009)
230-2	Sanford Bernstein & Co (x3359) - Four Sevens Investment Corp. - Account Statements (8/31/2009)
231-1	Sanford Bernstein & Co (x9166, x3314, x3359) - Four Sevens Investment Corp. - Account Statements - 2009
231-2	Sanford Bernstein & Co (x9166, x3314, x3359) - Four Sevens Investment Corp. - Account Statements - 2010
232-3	Sanford Bernstein & Co (x8818) - Gulf States Management Corp. - Account Statements - 2010
233-2	Sanford Bernstein & Co (x3281) - Gulf States Management Corp. - Account Statements - 2009
233-3	Sanford Bernstein & Co (x3281) - Gulf States Management Corp. - Account Statements - 2010
234-3	Sanford Bernstein & Co (x8965) - Gulf States Management Corp. - Account Statements - 2010
237-4	Washington Mutual Bank (x1563-0) - Gulf States Management Corp. - Account & Deposit Statements - 2009
238-4	Washington Mutual Bank/JP Morgan Chase Bank (x1940-1) - Gulf States Management Corp. - Account & Deposit Statements - 2009
238-5	Washington Mutual Bank/JP Morgan Chase Bank (x1940-1) - Gulf States Management Corp. - Account & Deposit Statements - 2010
241-12	Charles Schwab (x 1072) - Gulf States Management Corp. - Account Statements - 2009
241-13	Charles Schwab (x 1072) - Gulf States Management Corp. - Account Statements - 2010
248-4	Charles Schwab (x 7149) - Four Sevens Investment Corp. - Account Statements - 2010
286-1	Land Title Guarantee - 6/18/2010 Contract to Buy and Sell 2610 Arosa Drive Vail, CO & Closing Instructions
286-2	Land Title Guarantee - 6/30/2010 Company Agreement of Arosa Partners, LLC

Gov't Ex No.	Description
286-4	Land Title Guarantee - 8/2/2010 Wire Transfer in Receipt, \$852,117.23
286-6	Land Title Guarantee - 6/25/2010 View An Incoming Wire, \$50,000
286-8	Land Title Guarantee - 6/25/2010 Wire Transfer in Receipt, \$50,000
350-1	Demonstrative – Plan 1
350-2	Demonstrative – Plan 2
350-3	Demonstrative – Plan 3
350-4	Demonstrative – Plan 4
350-9	Demonstrative - Mooney's and Pursley's Travels (1999 - 2001)
350-11	Demonstrative – Gulf States Valuation

Pursley's Trial Exhibits

Def. Ex. No.	Description
1	Email from Mooney to ddial@www.hgd.com (12-19-2012)
2	Executive Summary to IRS CI by Counsel for Shaun P. Mooney (05-19-2014)
3	OVDP (09-22-2014)
4	Email from Shaun Mooney from Andrew Mellor (08-26-2013)
5	Letter from Shaun Mooney to Nigel Tibey (11-05-2008)
14	Gillis Letter of Non-Prosecution (executed by Davis) (04-10-2018)
16	Stock Transfer Sheets
17	Work assigned/status
18	Email from Michael Cougherty to Charles Gillis August 14, 2013 (08-14-2013)
19	Pursley Individual Master File
28	Form 484 Change to Company Details – APHC (07-21-2011)
29	APHC Share Certificate No. 2 (09-01-2009)
30	APHC Financial Report YE June 30 2010 (06-30-2010)
31	Email from Gillis to Dan Cogdell (01-25-2016)
32	Corporate Meeting Summary (03-04-2009)
35	Email from Gillis to Glover (03-27-2013)
38	Email from Eduard Venerabile to Gillis June 10, 2011 (06-10-2011)
39	Email from Eduard Venerabile to Gillis August 14, 2009 (08-14-2009)
40	Email from Gillis to Gary Glover August 4, 2011 (08-04-2011)
41	Email from Gillis to Glover and Coughtrey August 30, 2010 (08-30-2010)
42	Email from Gillis to Glover (08-24-2010)
44	Email from Gillis to 5gloves@ozemail.com.au (08-05-2009)
45	Email from Gillis to 5gloves@ozemail.com.au (07-24-2009)
46	Email from Gillis to Coughtrey (08-14-2013)
47	Email from Pursley to Andrew Mellor (06-21-2012)
48	Email from Gillis to Mooney and Pursley (06-30-2009)
50	Email from Mooney to Nigel Tebay (06-20-2007)
52	Email Gillis to 5gloves@ozemail.com.au (08-02-2009)

Def. Ex. No.	Description
54	Email from Gillis to Pursley and Mooney (05-10-2011)
56	Email from Gillis to Venerabile (06-04-2013)
57	Letter from Mooney to Gillis (07-10-2013)
58	Email from Gillis to Venerabile (02-22-2012)
61	Letter from Venerabile to The Directors of Dutton Limited (08-14-2001)
62	Option Contract for the sale of shares in APHC (04-10-2013)
65	Gillis Letter to Directors of Southeastern Shipping Company Limited (07-30-2009)
66	Gillis letter to Pursley re opinion re Federal Income Tax Consequences (10-29-2009)
69	RPLP Certificate of Formation (06-05-2009)
70	APHC Resolution of Directors (08-27-2009)
71	Email from Venerabile to Glover and Gillis (09-14-2012)
72	Email from Venerabile to Gillis (08-21-2012)
73	Email from Venerabile to Glover (04-19-2013)
74	Letter from Gillis to SES Directors (07-25-2010)
76	Order [ECF 70] (02-05-2019)
78	Email from Mellor to Gillis (04-10-2012)
79	Letter from Venerabile to Directors of SES (07-30-2009)
84	Email from Schuman to Pursley (08-07-2007)
88	Email from Venerabile to Gillis and Mellor (02-01-2012)
89	Email from Venerabile to Mellor and Gillis (04-10-2012)
90	Email from Pursley to Bratcher (10-24-2011)
93	Email from Bratcher to Pursley (09-30-2010)
94	Email from Venerabile to Gillis and Coughtrey (08-13-2012)
95	Email from Venerabile to Gillis and Mellor (11-08-2012)
99	APHC Cover Letter to UHY re Financial Report YE June 30 2011 (06-29-2012)
102	Email from Bratcher to Pursley (09-30-2010)
103	Email from Eduard Venerabile to Glover (04-19-2013)
104	Email from Bratcher to Pursley and Salinas (02-23-2012)
109	Email from Richman to Pursley (11-11-2011)
116	APHC Circular Resolutions of Directors (08-15-2012)
117	Promissory Note Between Pursley Interest and 4-7s
132	Email from Venerabile to Gillis and Glover (07-19-2012)
133	Pursley Memorandum to Mooney re Progress Report and Advisement (10-01-2009)
134	Letter from Gillis to IOMA attaching minutes (07-25-2010)
161	Melnik letter to IOMFL (04-07-1999)
168	Email from Mooney to Pursley (01-28-2010)
169	Email from Mooney to Gillis (01-28-2010)
173	Glover Memorandum to Gillis (05-10-2011)
181	Email from Markley to Gillis (06-02-2009)

Def. Ex. No.	Description
182	Email from Markley to Gillis (05-21-2009)
183	Email from Markley to Gillis (05-11-2009)
184	Email from Markley to Gillis (10-08-2009)
185	Email from Markley to Gillis (09-28-2009)
186	Email from Markley to Gillis (09-24-2009)
187	Email from Markley to Gillis (08-20-2009)
188	Email from Markley to Gillis (09-07-2010)
190	Email from Mooney to Gillis (01-25-2010)
191	Email from Mooney to Gillis (01-28-2010)
193	Email from Mooney to Gillis (03-04-2010)
197	Email from Mooney to Gillis (06-28-2010)
198	Email from Mooney to Gillis (06-28-2010)
199	Email from Mooney to Gillis (08-21-2010)
200	Email from Mooney to Gillis (07-16-2010)
201	Email from Mooney to Gillis (07-19-2010)
202	Email from Mooney to Gillis (07-28-2010)
203	Email from Mooney to Gillis (03-16-2011)
204	Email from Mooney to Gillis (07-14-2009)
216	Gillis Memorandum (07-10-2009)
217	Handwritten Notes
223	As Amended Form 5471
241	Handwritten notes
242	Gillis email to Pursley and Mooney (11-04-2009)
245	APHC De-Registration (04-21-2014)
251	American Real Estate Properties and Pursley Interests Agreement for Participating Interest
252	Pursley email to Bratcher (08-17-2010)
253	APHC Meeting Minutes (09-03-2009)
254	Foster Memorandum to Pursley (05-10-2009)
255	Venerable letter to Coughtrey (07-30-2009)
256	Mellor email to Pursley (02-02-2012)
257	Pursley email to Mellor (10-31-2012)
258	Venerable email to Mellor (08-06-2012)
259	Foster email to Pursley (04-17-2009)
260	Pursley email to Bratcher (02-03-2010)
261	Foster fax to Pursley (04-29-2009)
262	Foster Invoices (04-24-2009)
263	Foster Memorandum to Pursley (04-24-2009)
264	Foster Memorandum to Pursley (05-07-2009)
265	Gillis email to Pursley (05-07-2009)
266	Account Opening Documents for SES Account
267	2007 Form 1040X Amended Individual Tax Return - S. Mooney
269	SES Share Certificates (09-20-2001)

<u>Def. Ex. No.</u>	<u>Description</u>
270	Pursley email to Mooney (04-25-2009)
271	SES Corporate Records
283	Shaun Mooney TECS Report 10pp.
284	Steve Pursley TECS Report 9pp.
285	Venerable email to Pursley (08-23-2014)

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will serve a copy of this document on all counsel of record.



Sean Beaty
Trial Attorney, Tax Division